

- CALRECYCLE PUBLIC MEETING - APRIL 18, 2017-

Consideration of the
**CARPET AMERICA RECOVERY
PROGRAM (CARE)
2017-2021 REVISED STEWARDSHIP
PLAN**

Fareed Ferhut



California Carpet Stewardship Program Background

- **AB 2398:** First mandatory carpet stewardship program in U.S.
 - Requires “**continuous meaningful improvement**” in recycling & landfill diversion
- **CARE designs, implements Program**
 - **Funded by assessment** on new carpet sold in CA
- CalRecycle reviews Plan, provides oversight & enforcement

2017-2021 Carpet Stewardship Plan

- 2017-2021 Carpet Stewardship Plan disapproved on December 22, 2016
 - Based on seven Findings staff identified
- CARE submitted revised Plan on February 20, 2017

Finding 1: Not enough information to evaluate if recycled output goals constitute continuous meaningful improvement

CARE Response:

- 26% goal by 2021 represents aggressive growth & continuous and meaningful improvement
- Economic forecasting model developed
- Market implications of raising assessment must be taken into consideration.

Finding 1 Continued: Not enough information to evaluate if recycled output goals constitute continuous meaningful improvement

CalRecycle Analysis:

- No analytical basis for proposed 26% goal
- Absence of economic analysis
- Preserving carpet's market share is not an explicit goal of AB 2398

Finding 2: 2017 Plan does not discuss how stakeholder input is evaluated

CARE Response:

- Council ideas are budgeted for implementation in the current Plan
- Not sufficient time to review changes with the Council

CalRecycle Analysis:

- No comprehensive list of ideas from the Council
- Insufficient input from the Council on the revised Plan

Finding 3: 2017 Plan does not sufficiently address reasonable consumer access to recycling.

CARE Response:

- CARE will continue its work to make convenient collection available
- CARE will conduct convenience study

CalRecycle Analysis:

- One collection site per county is not convenient access
- No timeline for completing proposed convenience study

Finding 4: 2017 Plan reduces subsidy guarantee to 6 months

CARE Response:

- CARE reverted back to a twelve-month incentive guarantee, with the addition of a “safety valve” provision

CalRecycle Analysis:

- CalRecycle acknowledges CARE reverted back to twelve month incentive guarantee
- CalRecycle is concerned about the “safety valve”

Finding 5: 2017 Plan established new method for measuring progress toward diversion & recyclability goals

CARE Response:

- CARE did not intend to replace or redefine the original diversion definition

CalRecycle Analysis:

- CalRecycle acknowledges that CARE has addressed this Finding

Finding 6: 2017 Plan fails to identify or evaluate E&O activities needed to increase recycling and diversion.

CARE Response:

- Added E&O activities for installers, building owners and managers
- Marketing practice should not be directly tied to operational goal

CalRecycle Analysis:

- The purpose of education and outreach must be to achieve the goals of the program

Finding 7: 2017 Plan does not sufficiently address increasing recycled content in carpet.

CARE Response:

- Financial incentives to the mills are well beyond the scope of the financial capacity of this Plan
- CARE committed to provide grants, consultation, etc.

CalRecycle Analysis:

- CalRecycle sees merit in expanding the scope of the Plan to include a comprehensive strategy to accelerate manufacturing of recycled carpet content

Options for Director:

1. Disapprove the revised 2017 Plan
 - a) CARE unlikely to achieve continuous & meaningful improvement in carpet recycling
 - b) Direct staff to present a draft plan for enforcement actions
2. Approve the revised 2017 Plan
 - a) Allow continued implementation of current program



Promoting A More Sustainable California



www.calrecycle.ca.gov/carpet